

EXHIBIT 1

Gandhi v. Dell

Plaintiffs' Definitions of "Business Sales Representative" Class

- Call center sales reps required to take inbound phone calls on a scheduled shift
(Complaint at ¶¶ 8 & 11)
- Telephone-dedicated employees in call centers whose primary job duty is selling to business customers
(Gandhi's discovery requests to Dell)
- All had "Inside Sales Representative" job description
(Plaintiffs' certification motion at 5 and Exhibit ~~VV~~ ^A)

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64 Plaintiffs Have Opted In through October 14

- 4 apparently never sales representatives at Dell
- *All* of the opt-in employees (60/60):
 - were employed in Small & Medium Business (SMB) unit
 - worked on inbound telephone routing sales queues → *NO*.
 - worked on a shift scheduled by Call Center Operations
- Almost all were ISR IBs (57/60)
 - 1 never progressed beyond ISR ID
 - 2 started as ISR I

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Class Definition Proposal

- 1. Inside Sales Representatives**
who worked in
- 2. Inbound telephone routing queues**
on a
- 3. Shift scheduled by Call Center Operations**
in
- 4. Dell's Small & Medium Business (SMB) Unit**

Who Should Get Notice – ISR Is in SMB

Meet Class Definition	Don't Meet Class Definition
<p data-bbox="971 268 1019 961">SMB ISR IB, IC, ID, some ISR I*</p> <ul style="list-style-type: none"> ▪ Transactional sales ▪ Call center based ▪ Take inbound calls in routing queue ▪ Have no assigned accounts ▪ Must be on phones during scheduled shifts ▪ <i>Covers all consent filers</i> 	<p data-bbox="971 1367 1019 1675">All other ISRs</p> <ul style="list-style-type: none"> ▪ Relationship sales ▪ Not in telephone routing queue ▪ Make outbound calls and emails ▪ Have assigned accounts ▪ Do not have telephone shifts ▪ <i>Excludes no consent filers</i>

* SMB ISR Is who opt in but do not meet the class definition can be removed